

1 CALDWELL LESLIE & PROCTOR, PC  
2 ROBYN C. CROWTHER, State Bar No. 193840  
3 *crowther@caldwell-leslie.com*  
4 LENNETTE W. LEE, State Bar No. 263023  
5 *lee@caldwell-leslie.com*  
6 CAMERON J. JOHNSON, State Bar No. 266729  
7 *cjohnson@caldwell-leslie.com*  
8 725 South Figueroa Street, 31st Floor  
9 Los Angeles, California 90017-5524  
10 Telephone: (213) 629-9040  
11 Facsimile: (213) 629-9022  
12

13 DENLEA & CARTON  
14 JEFFREY I. CARTON (*pro hac vice pending*)  
15 *jcarton@denleacarton.com*  
16 ROBERT J. BERG (*pro hac vice pending*)  
17 *rberg@denleacarton.com*  
18 2 Westchester Park Drive, Suite 410  
19 White Plains, New York 10604  
20 Telephone: (914) 331-0100  
21 Facsimile: (914) 331-0105  
22

23 Attorneys for KATHRYN WORKMAN

24 **UNITED STATES DISTRICT COURT**  
25  
26 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**  
27

28 KATHRYN WORKMAN, on behalf of herself  
and all others similarly situated,

Plaintiff,

v.

PLUM INC., D/B/A/ PLUM ORGANICS, and  
CAMPBELL SOUP COMPANY,

Defendants.

Case No. CV15-2568-WHA

Honorable William H. Alsup

**STIPULATION TO CONTINUE CASE  
MANAGEMENT CONFERENCE AND  
[PROPOSED] ORDER**

**STIPULATION**

Plaintiff Kathryn Workman and Defendant Plum, PBC d/b/a Plum Organics (erroneously sued as Plum Inc.) (collectively, the “Parties”)<sup>1</sup>, by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, on June 9, 2015, Plaintiff filed the Complaint in the above-captioned action;

WHEREAS, the Initial Case Management Conference in this matter is scheduled for Thursday, September 17, 2015, at 11:00 a.m.;

WHEREAS, Defendant Plum, PBC (“Plum”) filed its Motion to Dismiss the Complaint (“Motion”) on August 27, 2015;

WHEREAS, Plum’s Motion is scheduled to be heard on Thursday, October 29, 2015, at 8:00 a.m.;

WHEREAS, the Parties agree that, to conserve the Parties’ resources as well as those of the Court, the Initial Case Management Conference should be continued so that it may occur on the same day as the hearing on Plum’s Motion;

WHEREAS, NOW, THEREFORE, the Parties, by and through their respective counsel, HEREBY STIPULATE AND REQUEST that the Initial Case Management Conference be continued from September 17, 2015, at 11:00 a.m. to October 29, 2015, at 8:00 a.m., and that the deadlines associated with the Initial Case Management Conference, including the Parties’ deadlines to complete their conference pursuant to Federal Rule of Civil Procedure 26(f) and to make initial disclosures pursuant to Rule 26(a)(1), be continued accordingly.

//

//

//

//

//

---

<sup>1</sup> The Complaint also named Campbell Soup Company (“CSC”) as a Defendant. On August 26, 2015, the Parties stipulated to dismiss CSC. CSC was dismissed on August 31, 2015.

1 **IT IS SO STIPULATED.**

2 DATED: September 1, 2015

CALDWELL LESLIE & PROCTOR, PC

3  
4 By /s/ Robyn C. Crowther

ROBYN C. CROWTHER

5 Attorneys for KATHRYN WORKMAN

6  
7 DATED: September 1, 2015

MAYER BROWN LLP

8  
9 By /s/ Keri E. Borders

KERI E. BORDERS

10 Attorneys for PLUM INC., d/b/a PLUM ORGANICS

11 **[PROPOSED] ORDER**

12 Pursuant to Plaintiff Kathryn Workman and Defendant Plum, PBC d/b/a Plum Organics's  
13 (erroneously sued as Plum Inc.) (collectively, the "Parties") stipulation, it is HEREBY ORDERED  
14 that the Initial Case Management Conference in this matter is continued from Thursday,  
15 September 17, 2015, at 11:00 a.m. to Thursday, October 29, 2015, at 8:00 a.m. All deadlines  
16 associated with the Initial Case Management Conference, including the Parties' deadlines to  
17 complete their conference pursuant to Federal Rule of Civil Procedure 26(f) and to make initial  
18 disclosures pursuant to Rule 26(a)(1), are continued accordingly.

19 **IT IS SO ORDERED.**

20 DATED: September 2, 2015.



HONORABLE WILLIAM H. ALSUP

United States District Judge

21  
22  
23 **ATTESTATION**

24 I, Robyn C. Crowther, hereby attest, pursuant to N.D. Cal. Local Rule 5.1(i)(3), that  
25 concurrence to filing this document has been obtained from each signatory.

26 By: /s/ Robyn C. Crowther